

P279 'Correcting the BSC description of the CDCA to SVAA interface for GSP Group net Export' Consultation Responses

Consultation issued on 21 October 2011

We received responses from the following Parties

Company	No BSC Parties / Non-Parties Represented	Role of Parties/non-Parties represented
Northern Powergrid	2/0	Distributor
IBM UK Ltd on and behalf of the ScottishPower Group	7/0	Supplier/ Generator/ Trader/ Consolidator/ Exemptable Generator/ Distributor
EDF Energy	10/0	Generator/ Supplier/ Trader/ Party Agent/ Consolidator/ Exemptable Generator

What stage is this document in the process?

01 Initial Written Assessment

02 Definition Procedure

03 Assessment Procedure

04 Report Phase

Question 1: Do you agree with the Panel's view that the Proposed Modification should be approved?

Summary

Yes	No	Neutral/Other
3	0	0

Responses

Respondent	Response	Rationale
Northern Powergrid	Yes	We agree with this change on the basis that it improves the accuracy of the wording in the BSC, and lowers the risk of settlement inaccuracy.
IBM UK Ltd on and behalf of the ScottishPower Group	Yes	ScottishPower agree with the view that this modification rectifies a self evident error and clarifies the intention of the Code on GSP import/export of energy. It would reduce potential settlement errors and therefore better facilitate the achievement of BSC Objective (d) on efficient implementation and administration of the BSC arrangement.

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Respondent	Response	Rationale
EDF Energy	Yes	There is a self-evident error in the BSC in relation to net export from a GSP Group. The proposed change will reduce the likelihood of such flows being settled irrationally in future.

Question 2: Do you agree that the draft legal text delivers the intention of P279?

Summary

Yes	No	Neutral/Other
2	0	1

Responses

Respondent	Response	Rationale
Northern Powergrid	Yes	-
IBM UK Ltd on and behalf of the ScottishPower Group	Yes	ScottishPower agree that the draft legal text appears appropriate.
EDF Energy	-	The change to R5.7.1(b) ensures that information on the direction of GSP Group Take is provided by CDCA to the SVAA. However, the text of the suggested new section R5.7.2 is inconsistent with the definition of GSP Group Take in Table X-2, could lead to further misunderstanding, and is probably unnecessary. Further comments are provided in response to Question 5 below.

Question 3: Do you agree with the Panel's suggested Implementation Date?

Summary

Yes	No	Neutral/Other
3	0	0

Responses

Respondent	Response	Rationale
Northern Powergrid	Yes	-
IBM UK Ltd on and behalf of the ScottishPower Group	Yes	ScottishPower agree that the modification should be implemented as soon as possible
EDF Energy	Yes	Elexon advise that the change is to the BSC itself only, and has very low cost. The change should have no direct impact on participant systems or processes and will reduce the likelihood of self-evidently erroneous outcomes from the settlement process. On this basis it should be implemented as soon as is practical.

Question 4: Do you agree with the Panel's view that P279 should be progressed as a Self-Governance Modification Proposal?

Summary

Yes	No	Neutral/Other
3	0	0

Responses

Respondent	Response	Rationale
Northern Powergrid	Yes	-
IBM UK Ltd on and behalf of the ScottishPower Group	Yes	ScottishPower agree that the modification corrects a self evident error in the Code; has minimal material impact and suitable for consideration under the self governance process.
EDF Energy	Yes	The current error has an effect on participants, on competition, and is discriminatory between participants. The materiality is currently very small, although in future it could potentially be very large, and thus the proposal might not be considered to meet the self-governance criteria. However, in the particular circumstances of low current materiality, a self-evident error, and a solution that is unlikely to be controversial or expensive, we think it sensible to progress the change as a self-governance modification.

Question 5: Do you have any further comments on P279?

Summary

Yes	No
1	2

Responses

Respondent	Response	Rationale
Northern Powergrid	No	-
IBM UK Ltd on and behalf of the ScottishPower Group	No	-
EDF Energy	Yes	<p>For most purposes of balancing and settlement in the BSC, the convention and definition is to consider energy flows to the Total System (including distribution) as Export, having a positive sign, and energy flows from the Total System as Import having a negative sign. This creates potential for misunderstanding and error when combined with the different convention and practice in the Supplier Volume Allocation arrangements of Section S, and in consideration of distribution boundary flows. In Section S, flows are usually unsigned, with export and import processed separately in all but final summations, where export from user sites to distribution is subtracted, ie considered negative, the opposite sign convention to that used elsewhere in the BSC, and GSP Group Take is considered to be normally positive. The error identified by this proposal is one such occurrence, but we believe there may be other opportunities for misunderstanding.</p> <p>For example we note that:</p> <ul style="list-style-type: none"> The calculation of GSP Group Correction in Section S-2 9.2.1 clearly expects a normally positive value of GSP Group Take. Section X-2 section 2.4.2 concerning sign conventions makes a special exception for GSP Group Take, stating that it "shall, for the avoidance of doubt, be positive, negative or zero as determined in accordance with the algebraic determination of such variable pursuant to the

Respondent	Response	Rationale
		<p>Code.”</p> <ul style="list-style-type: none"> <li data-bbox="571 219 1209 846">• In our view, the definition of GSP Group Take in Section X-2 Table X-2 is only rational if GSP Group Take is to be considered normally as a negative quantity, for which subtraction of the magnitude of CVA exports makes it more negative, ie increases the SVA demand. This would require GSP Group Volume determined by CDCA (the flow at the distribution-transmission boundary) to normally be negative. Perhaps a clarification should be added to this definition to indicate that for the purposes of CDCA (CVA) calculations a flow from transmission to distribution is considered negative and the reverse flow is positive (as written), while for the purposes of SVAA calculations, the signs are reversed. <li data-bbox="571 875 1209 1099">• The definition of GSP Group Take in Section X-2 Table X-6 refers only to a number, hinting at an unsigned value rather than a signed value (consistent with current R5.7.1). Perhaps this definition should also be changed to refer to “value”. <li data-bbox="571 1128 1209 1400">• Section S-2 Section 10.1.2 says that the SVAA “shall use the relevant value of GSP Group Take (GSPGTHj) which is derived from the corresponding Volume Allocation Run provided by the CDCA in accordance with Section R5.7”. Note that it refers to a value “derived from” and not necessarily the actual value provided.